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The following table outlines our response to the comments received by the GLA dated March 2021

I.D	GLA COMMENT	RESPONSE
1.	**Para 18** – The applicant is not proposing any affordable workspace as part of the outline application, which does not align with the expectations of Policy E2 of the London Plan (2021). It is noted, however, that the applicant is proposing the provision of 375 sq.m. of affordable workspace at nos. 14-19 Tottenham Mews, as part of the separate application referred to above. Camden Local Plan Policy E2 states consideration will be given to higher intensity redevelopment of premises or sites that are suitable for continued business provided that, inter alia, the proposed premises include floorspace suitable for start-ups, small and medium sized enterprises, such as managed affordable workspace where viable. The applicant states that provision of affordable workspace on site would negatively impact on the development's viability and that as such, off-site provision in close proximity to the site, would be in accordance with local policy requirements. In line with Policy E3 of the London Plan (2021), the Council should ensure rents are maintained below the market rate for that space for a specific social, cultural or economic development purpose. The s106 should appropriately link the two sites.	The Applicant agrees that the rents will be maintained below the market rent for the affordable workspace and this will be agreed and discussed with Camden during the determination of the planning application.
2.	**Para 43** – fire statement has not been provided. In line with Policy D12 of the London Plan (2021), a fire statement should be submitted which has been prepared by a suitably qualified third-party assessor. This should clearly address the requirements of the policy, including details of construction methods and materials, means of escape, fire safety features that reduce the risk to life and means of access for fire service personnel. This should be provided prior to Stage 2.	Please refer to the Stage 2 Fire Strategy produced by Norman Disney & Young at **Appendix 1.**

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3.	**Para 44-** seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and is designed to incorporate safe and dignified emergency evacuation for all building users.	Please refer to planning drawings that demonstrate that the proposal provides level access to all entrances from street, including level access to Cycle stores and accessible showers and spaces for recumbent cycles. It is worth noting that the existing building has stepped access from both Tottenham Crt Road and Whitfield Street entrance and performs extremely poorly from an accessibility perspective. In the proposal, level access is also provided to all terraces and external space. Accessible WCs are provided on all levels. With respect to disabled evacuation, the current proposal is to use the firefighting lift as the primary means for disabled evacuation. The Goods lift could also be considered as a secondary option, with the required back-up power and controls provided to facilitate emergency evacuation with this lift.
4.	**Para 51** – Whilst the applicant has sought to mitigate the impacts of the proposed building by terminating some lifts below parapet level, and providing a glazed balustrade at rooftop level, all opportunities to reduce the impact on the strategic view should be explored, as suggested by Historic England and in line with London Plan Policy. Further information should be provided setting out the impact on the view of the World Heritage Site and the additional visual analysis should also be provided to the GLA prior to Stage 2.	Numerous options for reducing the volume of breach have been explored. The alternative options all require the substitution of a continuous lift to the highest floor with a separate platform lift (thereby reducing height of lift overruns at roof level). These all resulted in what was felt as an unacceptable discrimination in regard to accessibility as it would require a wheelchair user to have to transfer lifts to reach the highest level whereas other users could travel between floors directly via a continuous staircase. A balustrade will be required at roof level for safe maintenance irrespective of use.
5.	**Para 61 -** The applicant has identified and assessed 9 local views within the HSTVIA which have been agreed with the Council. In all but one view, the proposed development would not have a detrimental impact. Whilst the proposals would increase the height and massing from that of the existing building by approximately 8	The GLA have stated that the proposed development would cause less than substantial harm to the Grade II BT Communications Tower, as assessed in Local View 2.

	metres, the architecture of the building would be improved, it would complement surrounding developments and enhance the streetscape in the area. However, View 02 from Capper Street would be negatively impacted by the proposals. The increase in massing would result in the visibility of the slender lower section of the Grade II listed BT Communications Tower being obscured by the upper levels of the development and as such, less than substantial harm would be caused to this heritage asset. The applicant should clearly set out the public benefits of the scheme to enable GLA officers to assess whether these could offset the harm caused to the heritage asset.	Our assessment is that the development would have a positive effect on the townscape of this view. There would be an increase in massing, and the height of the proposed building would result in a reduction in the visibility of the Grade II Listed BT Communication Tower, its slender lower section being obscured in Local View 2 from Capper Street by the upper levels of the development. However, the much improved and refined architectural design of the proposed building would be beneficial to the setting of this listed building and to the setting of the Bloomsbury Conservation Area, in which the viewpoint is located. The curve of the rooftop pavilion, set back on Tottenham Court Road and Howland Street, allows for clear views of the upper curved former viewing platforms of the tower, and presents an appropriate context of materiality. Equally, at ground floor the curved corner to Tottenham Court Road relates more appropriately to the streetscape and provides a much-improved active frontage. The overall effect on the townscape, the view and the setting of heritage assets would be major beneficial. Capper Street runs east west between Huntley Street and Tottenham Court Road. At the east end of Capper Street is a clear view of the BT Communications Tower and its slender lower section. As the viewer moves further west the current building obstructs views of this lower slender section. Although the proposed development is taller than the existing building, the visibility of the slender section of the BT Communications Tower would be maintained in views slightly further east of the assessed viewpoint from Capper Street. The GLA has recommended that the public benefits of the scheme are clearly set out so that GLA officers can assess whether the

		perceived less than substantial harm to the BT Tower is outweighed by public benefits. The proposals provide the following key public benefits: • A new, highly efficient, sustainable and adaptable building of much improved architectural quality that better addresses this significant and prominent corner site, providing a building with a unified façade treatment and sculptural elements with a strong geometric grid form in deep relief. The proposed building would create a cohesive urban block that contributes positively to the setting of nearby heritage assets and, as acknowledged by the GLA, will enhance the streetscape in the area; • The reactivation of all street elevations to enliven the streetscape, providing a high-quality retail frontage to Tottenham Court Road, with the main office entrance on Howland Street and a secondary office entrance of Whitfield Street; • External amenity for building users in the form of external roof terraces at level 8 and 9; • The removal of the protruding basement vents which narrow the pavement on Howland and Whitfield Streets and the access point, Cypress Place, which runs through the urban block and interrupts the pavement, allowing for wider pavements and a much-improved streetscape for pedestrians; and • Extensive public realm improvements including significant urban greening and landscape improvements at street level, as well as sculptural benches on Whitfield Street and Howland Street.

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6.	**Para 62** – As set out at pre-application stage, the applicant should confirm that the heritage assets and conservation areas identified in paragraph 43 above would not be impacted as a result of the development or, in such case that harm is caused, a full assessment should be provided prior to Stage 2.	The GLA have stated that the proposed development would cause less than substantial harm to the Grade II BT Communications Tower, as assessed in Local View 2. Our assessment is that the development would have a positive effect on the townscape of this view. There would be an increase in massing, and the height of the proposed building would result in a reduction in the visibility of the Grade II Listed BT Communication Tower, its slender lower section being obscured in Local View 2 from Capper Street by the upper levels of the development. However, the much improved and refined architectural design of the proposed building would be beneficial to the setting of this listed building and to the setting of the Bloomsbury Conservation Area, in which the viewpoint is located. The curve of the rooftop pavilion, set back on Tottenham Court Road and Howland Street, allows for clear views of the upper curved former viewing platforms of the tower, and presents an appropriate context of materiality. Equally, at ground floor the curved corner to Tottenham Court Road relates more appropriately to the streetscape and provides a much-improved active frontage. The overall effect on the townscape, the view and the setting of heritage assets would be major beneficial. Capper Street runs east west between Huntley Street and Tottenham Court Road. At the east end of Capper Street is a clear view of the BT Communications Tower and its slender lower section. As the viewer moves further west the current building obstructs views of this lower slender section. Although the proposed development is taller than the existing building, the visibility of the slender section of the BT Communications Tower would be maintained in views slightly further east of the assessed viewpoint from Capper Street.

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		The GLA has recommended that the public benefits of the scheme are clearly set out so that GLA officers can assess whether the perceived less than substantial harm to the BT Tower is outweighed by public benefits. The proposals provide the following key public benefits: • A new, highly efficient, sustainable and adaptable building of much improved architectural quality that better addresses this significant and prominent corner site, providing a building with a unified façade treatment and sculptural elements with a strong geometric grid form in deep relief. The proposed building would create a cohesive urban block that contributes positively to the setting of nearby heritage assets and, as acknowledged by the GLA, will enhance the streetscape in the area; • The reactivation of all street elevations to enliven the streetscape, providing a high-quality retail frontage to Tottenham Court Road, with the main office entrance on Howland Street and a secondary office entrance of Whitfield Street; • External amenity for building users in the form of external roof terraces at level 8 and 9; • The removal of the protruding basement vents which narrow the pavement on Howland and Whitfield Streets and the access point, Cypress Place, which runs through the urban block and interrupts the pavement, allowing for wider pavements and a much-improved streetscape for pedestrians; and • Extensive public realm improvements including significant urban greening and landscape improvements at street

		level, as well as sculptural benches on Whitfield Street and Howland Street. The impact of the development on the setting of the Bloomsbury, Fitzroy Square, Charlotte Street Conservation Areas is assessed in the Heritage Statement and Townscape Visual Impact Assessment (TVIA), which concludes that the development would overall enhance the settings of these conservation areas and the setting of the listed buildings within them, where the development would be visible. The following listed buildings are noted in paragraph 55 of the GLA Report: Nos. 15, 16, 17, 29, 30-34, 56, 58-62, 63-68 Warren Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. Nos. 7, 9 and 11, 15, 14-20, 22 and 24, 23-33 Conway Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape, the topography which is largely flat and due to distance. Nos. 2, 46, 48, 50, 52 Maple Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. Nos. 112, 159, 161 Whitfield Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape

		which has a largely grid like pattern and due to distance. The closest building to the site is 112 Whitfield Street and part of its western elevation is just visible in the far distance if zoomed in, however due to the north south axis of Whitfield Street this elevation is seen obliquely. If the proposals were visible from the setting of the listed building this would be positive due to the improved and refined architectural design. Nos. 37-45, 65-71, 78 and 80 Grafton Way - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. Nos. 68 and 106 Cleveland Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. Nos. 46, 48 and 50 Fitzroy Street - Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. J Evans terraced house and shop and the Indian Young Men's Christian Association – both Grade II listed. The development is unlikely to have any impact on the setting of these listed buildings. This is due to the nature of the existing townscape which has a largely grid like pattern and due to distance. No. 58 Grafton Way – Grade II*. The development is unlikely to have any impact on the setting of this listed building. This is due to the

		nature of the existing townscape, with blocks of development separating the listed building form the site and due to distance. Nos. 9 and 10, 11, 12, 15-19, and 20-32 Fitzroy Square – Grade II*. The development is unlikely to have any impact on the setting of these listed buildings and the Square. This is due to the nature of the existing townscape which has a largely grid like pattern, the topography which is largely flat and due to distance. Whilst the site is not within a conservation area, it is surrounded by the following conservation areas: Bloomsbury, Fitzroy Square, Charlotte Street and, at a greater distance, East Marylebone, Harley Street and Regent's Park. The impact on the East Marylebone, Harley Street and Regent's Park Conservation Areas was not assessed and this assessment is provided below. The East Marylebone Conservation Area is located to the west of the development site in the City of Westminster. Its eastern boundary adjoins the western boundary of the Charlotte Street Conservation Area in the London Borough of Camden. The East Marylebone Conservation Area is located some distance away and there would be no impact on the majority of the conservation area. Glimpsed views of the development site may be possible in the view east along Howland Street. The Heritage Statement and TVIA assesses views along Howland Street (in positions closer the site) and establishes the beneficial impact of the development in such views. This beneficial impact is as a result of the improved public realm and planting and a building of improved architectural quality on this prominent corner site. In any longer views from locations further

		west on Howland Street in the East Marylebone Conservation Area the impact would be similarly beneficial. Harley Street and Regent's Park are located to the west and north west of the development site in the City of Westminster and are located a considerable distance from the site. Due to this distance and the nature of the existing townscape and topography the development site is unlikely to have any impact on the setting of these conservation areas.
7.	**Para 63** – The Sustainability Statement which supports the outline application does not provide sufficient information to allow and assessment to be undertaken. The energy strategies for both reserved matters applications have been reviewed and generally comply with the London Plan (2021) policies. The applicant will be assessing the CO2 emission performance against London Plan policies using the SAP 10 emissions factors which is supported. The applicant has submitted information from the GLA's spreadsheet which has been developed to allow the use of the updated SAP10 emission factors alongside the SAP 2012 emission factors. The applicant is required to submit the GLA spreadsheet in excel format.	Both RMA applications have undertaken detailed energy assessments in compliance the GLA's adopted London Plan. GLA excel spreadsheets have been completed and are included within this response at **Appendix 2.**
8.	**Para 64** – Based on the information provided the office and retail element of the proposed development is estimated to achieve a reduction of 38 tonnes per annum (14%) in regulated Cos emissions compared to a 2013 Building Regulations compliant development. The life-science element of the proposed development is estimated to achieve a reduction of 21 tonnes per annum (7%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development.	The Energy Statement for office building RMA indicates that 15% CO2 reduction can be achieved through Be Lean energy efficiency measures. This has been calculated using GLA carbon reporting spreadsheet based on SAP10 carbon factors and reflected in our report. The Energy Statement for the Life Science building shows that a 7% CO2 reduction can be achieved through Be Lean energy efficiency measures, which is lower than the London Plan target of 15%. This is due to the lab systems being more energy intense than the office systems. The life-science building comprises 1/3 lab space, meaning

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	The applicant should note that the London Plan includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants are expected to meet. The applicant should therefore model additional energy efficiency measures to meet this target.	the auxiliary energy for this building increases significantly. The auxiliary energy is predominantly to do with the AHU fan power and SFP of the system. These systems are difficult to target in terms of energy efficiency; therefore, the life science building does not meet the 15% for Be Lean. Please refer to Separate GLA consultation Energy Memo at **Appendix 2**
9.	**Para 67 & 68** – The applicant has provided a commitment to ensure that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future proofed for a connection to a district heating network have been provided. The space indicated for a future district heating plant room is allocated to office space. The applicant should confirm that this space could be secured for use should a district heating scheme come forward. The applicant is proposing communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site should be provided	The Ground floor area identified as a potential future DEN plantroom is considered a suitable location. The following considerations would need to be made before confirming that connection to a DEN is the correct action for this building: 1. A connection to the DEN would only be considered at the point that replacement of the Network Building central plant was required, and not during the course of the plants' economic life. The central plant proposed has an indicative economic life expectancy of 20 to 25 years. This is several 'leasing cycles' in the future and the feasibility of the DEN connection would need to be re-evaluated at the end of a tenant lease period. 2. A cost-benefit analysis would need to be carried out at the point that a DEN became available for connection. Given that low-carbon district energy networks do not exist within the vicinity of the site (and with no plans for future expansion), a connection to the DEN would need to be proven to be a more sustainable solution than the on-site all-electric heating and cooling plant.

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		3. With the ongoing changes to carbon factors for gas and electricity (due to the greening of the electrical grid), an all-electric building is significantly less carbon intensive than when analysed previously. As such, the performance of any DEN plant would need to be assessed against the Network Building all-electric plant at the time of consideration. With respect to the communal heat network comment, the Network Building is a single building development, and as such the comment is not relevant to the scheme.
10.	**Para 69-70**– With regards to the office scheme, the applicant is proposing to install 3.9 kWp of Photovoltaic (PV) panels and should confirm the net PV area and kWh of electricity generation. A roof layout has been provided which appears to demonstrate that there is additional space for PV. With regards to the life-science building, the applicant is proposing to install 52.4 kWp of PV panels equating to 232 sq.m. of net PV area and should confirm the kWh of electricity generation. A roof layout has been provided, which suggests that PV has been maximised. The applicant should reconsider the PV provision for the office scheme and provide a detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met. Heat pumps are being proposed in the form of a (centralised) ASHP system for both the office scheme and life-science scheme. Further information on the heat pumps should be provided for both scheme options (further detailed comments provided in the separate GLA response)	The application for office building includes 12no 325Wp panels generating an estimated 3,050kWh/annum of electricity. The total PV array area provided is 20.5m². All usable roof space has been fully utilised for this PV provision and can be seen on the PV layout drawing within "Be Green" section of the energy statement and on roof layout drawings included in Appendix D. These drawings illustrate that all remaining roof space has been allocated to MEP plant installations. The application for the Life Science scheme includes 232m² of net PV area. The energy production for the PV panels is 2.87kWh/m². This equates to an estimated electricity production of 44,735kWh per annum. **For the office building**:

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		a) The estimated heating and cooling energy provided (from the Part L energy model) is as follows: Space heating – 68.4 MWh/annum Space cooling – 300 MWh/annum The heat pumps will provide 100% of heating and cooling requirements for the site, as they are the only source of heating and cooling serving the development. More detailed thermal modelling of the building will be carried out at the next design stage and as such the above estimates will be further refined. **b**) Both the SEER and SCOP of the plant proposed will exceed the requirements of the Non-Domestic Building Services Compliance Guide. Detailed thermal modelling of the building will be completed at the next design stage, at which time the information requested can be provided. SEER and SCOP information to date has been based on preliminary plant selections at this stage of the project, with the worst-case performance from a number of plant manufacturers being considered. **c)** The heat source temperature for space heating systems is 45 degrees C. The heat source temperature of the domestic hot water system is 60 degrees C. Heating losses from hot water and heating pipework will be designed such that they are compliant with the Non-Domestic Building Services Compliance Guide. It is worth noting also that DHW heating for WC area wash hand basins on the office floors is via electric point of use heaters, which will help to minimise standby and circulation losses in the system.

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		d) No, there is no additional technology required for top-up during peak periods. The plant will be designed to cater for the peak loads of the building.
11.	**Para 71** – The carbon dioxide savings exceed the on-site target set within Policy SI2 of the London Plan (2021) for non-domestic uses. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. The detailed, technical comments have been sent to the applicant and Council.	The carbon shortfall and estimated offset payments have been included in the report for the office scheme.
12.	**Para 74-76** – Whilst the applicant's Sustainability Statement refers to embodied carbon and a life cycle assessment being undertaken, no information on Whole Life-cycle Carbon (WLC) appears to have been submitted. The applicant must provide a completed WLC assessment template (as an Excel document, not a PDF) and follow the GLA WLC guidance. The applicant should submit a WLC assessment template in full, to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made. The assessment should comply with EN 15978 and cover all applicable building elements and lifecycle modules. Two assessments are required to be submitted through the GLA WLC template – one that does not account for decarbonisation of the grid (Assessment 1) and another that does account for decarbonisation to both operational and embodied carbon (Assessment 2). Carbon emissions during lifecycle modules A1-A5 and B1 of Assessment 2 should not include the decarbonised figures. Please refer to the GLA WLC guidance documents and RICS PS for more details.	Detailed Whole Life Carbon assessments have been undertaken for both RMAs detailing performance against the GLA's adopted WLC benchmarks and outlining further opportunities for reducing embodied carbon emissions. GLA WLC excel spreadsheets have been provided for both applications showing carbonised and decarbonised figures, included as part of this response alongside Appendix C of the GLA's Circular Economy Guidance detailing a bill of materials table identifying quantities and recycled content of major building elements. Please refer to **Appendix 2**

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13.	**Para 78 & 79** – The applicant should confirm that at least 20% of the total value of materials used should derive from recycled and reused content in the materials and products selected, and commit to achieve the targets of reusing, recycling and recovering 95% of construction and demolition waste, and putting 95% of excavation waste to beneficial use. The applicant should also commit to; providing notification of the likely destination of all waste streams, providing written confirmation that destination landfills have capacity to receive waste, meeting the Mayor's 65% target for municipal waste recycling and, demonstrating that all development designs have adequate, flexible and easily accessible storage pace and collection systems that support, as a minimum, the separate collection of dry recyclables and food.	A completed GLA Circular Economy Guidance – table 1 has been completed identifying the strategic approach to a Circular Economy for the proposals confirming commitments to diversion from landfill targets for demolition, excavation, construction and municipal waste as per the GLA's targets. This strategic approach also includes a commitment to specify materials with a minimum 20% recycled and reused content. As outlined in both RMA applications the proposals include storage space and collection mechanisms that support the appropriate segregation of waste as per GLA requirements with a commitment to ensure designated landfill sites have adequate capacity to take any waste. A response to the GLA circular economy outline application template has also been included as part of this response **Appendix 2**
14.	**Para 82** – The assessment has demonstrated that the contribution of these generators will have a negligible impact on annual mean concentrations of nitrogen dioxide and particulate matter. The assessment has also shown that the emissions from these generators are unlikely to lead to an exceedance of the short-term air quality objectives. The Council should satisfy itself that the development complies with London Plan Policy SI1 (B). However, potential alternatives to diesel-fuelled emergency generators are available and it is advised that these be explored with the applicant to avoid the worsening of air pollution in an area of existing poor air quality.	The design team will explore the feasibility of using the alternative technologies instead of diesel generators in the next design stage.
15.	**Para 85** - The proposed development includes some positive urban greening, in particular the rain garden along Howland Street and Whitfield Street. The applicant has calculated the UGF of the proposed outline development as 0.22 and has provided information regarding the constraints that result in the UGF failing to meet the 0.3 target for commercial development as set out in Policy G5 of the London Plan (2021). However, further opportunities for greening should be considered in order to increase the score to comply with the 0.3 target. Features for consideration may include;	The team has worked extensively on multiple design options to increase the UGF calculation, including all the suggested strategies which turned out to be not viable, due to the key following issues: 1 - The proposed green roof allows for a very shallow soil depth (80mm) in order to minimise the impact on the building structure, as deeper soils would add extra load to the structure and would thus

	improving the quality of the proposed green roof and extending the green roof under the proposed solar panels, including a green wall or sections of the building facade, increase planting at the ground level and expand greening on the proposed terraces	require deeper structural beams, affecting the floor to underside of structure height of the internal spaces. Furthermore, a deeper soil depth would result in an increase of the overall building height. The team has explored an option which looked at having 300mm soil build-up, which would mean raising the Terrace FFL and all guard railings and balustrades associated with it by the same dimension, meaning an even bigger impact into the LVMF. Raising the FFL of the Terrace would also create accessibility issues for the stair connecting L08 to the terrace. 2 - Green facade design would increase the UGF calculation however this treatment only lends itself well to large areas of solid facade. The proposed facade design and its solid vs glazed ratio aims to maximise the amount of natural light coming into the internal spaces, which as a consequence of this results in a reduction of the amount of large areas of solid facade. 3 - The increase of pavement width on Howland and Whitfield Streets is a key planning benefit, which has been levelled with the increase in green spaces at ground floor. However, further extension of the green areas at street level would mean a decrease in the proposed clear pavement width, resulting in more pinch points for the main pedestrian circulation flows. The design team has tried multiple design options to increase the UGF calculation of the RM01 scheme (as described in the item before), however there is the potential to increase the UGF of the RM-02 scheme to a final calculation of 0.294, by increasing the extent of green roof (under the PV panels). This hasn't been stated before because it was agreed to submit comparable areas of green roof for

		both Reserved Matter Schemes. That being said, the UGF calculation of the scheme can only be increased in case the RM-02 scheme (Labs Building) ends up being the one to proceed.
16.	**Para 86/87 -** The result of this review should be provided prior to Stage 2. The updated UGF should be provided with an accompanying drawing, demonstrating the extent of the different surface cover types proposed. Being an outline application, the scheme should demonstrate the degree to which the UGF is achievable based on the illustrative scheme. The fruition of the urban greening should then be secured through design codes and condition. Details of the proposed tree removal should be provided and wherever possible, trees should be retained. Where trees are removed, the applicant should provide an assessment of the value of the trees proposed to be lost ad set out how this has been accounted for through replacement tree planting.	Please refer to the response in para 15 A separate report will be provided to the GLA in due course.
17.	**Para 89** – The proposed seating and the reallocation of road space away from parking to pedestrian movement via the widening of the footways around the site would align with Policy T2 of the London Plan (2021) and is acceptable and should be secured via s106 agreement. This will reduce vehicle dominance around the site and improve the balance of space given to people to walk and dwell which is supportive of Policy T2 of the London Plan (2021). However, changes to Howland Street and Whitfield Street should ensure buses are still able to operate on safely and without delay if these roads are needed for diversions.	Noted. Further discussions are requested with TfL to establish the need for bus diversions via Howland Street and Whitfield Street, such that this can be reviewed in further detail.
18.	**Para 92 & 93** – A transport assessment (TA) has been provided for this proposed development, setting out the potential impacts this development may have on the local transport network. The trip generation assessment demonstrates a reduction in car driver trips, which is welcomed and an increase in sustainable modes, such as public transport, cycling and walking. The assessment indicates a sustainable mode	An assessment has been carried out to review the distribution of unground trips by station - please refer to N01-AS-London Underground Trip Distribution Note (210317) appended to this response in **Appendix 3.**

	share of 96%, which is supportive of the Mayors strategic aim for 90% of all trips in central London to be undertaken by walking, cycling or public transport by 2041. The TA should be amended so that the trip generation for the London Underground is analysed by station, line and direction. Depending on the outcome, the applicant may need to undertake a station capacity and line loading assessment. TfL would welcome further discussions about this matter and can supply the necessary data.	
19.	P**aras 95 & 96** – The proposed development is not expected to significantly impact bus network capacity nor require capacity enhancements. However, any changes to the highway and footway should not impact on bus journey times or reliability, or routeing. The applicant should confirm that there will be no impact on bus routes and journey times on Tottenham Court Road north and southbound both during construction and operation. The development will add to demand for cycle hire in the local area. TfL is reviewing nearby docking station capacity and will provide further clarification, regarding whether a contribution towards Cycle Hire expansion is required.	Noted. It is confirmed that the construction stage will not impact bus routes or network capacity, as all construction vehicle loading, and movement will take place on Howland Street and Whitfield Street (as set out within the submitted Draft CMP). In addition, bus routes and journey times on Tottenham Court Road will not be impacted during the operational stage, as all servicing will be undertaken within Cypress Place, with no vehicle activity taking place on Tottenham Court Road. The Applicant notes that the Site is located within proximity of a range of cycle hire docking stations, providing access to nearly 200 cycle hire docking points within a 600-metre walk. The Applicant will await further consideration from TfL.
20.	**Para 98 & 99** - Access to long stay cycle parking for the reserved matters two application (life-science building) will be via Cypress Place. This access will also be used by delivery, servicing and blue badge vehicles. There is a concern about the potential safety hazards this creates, which may conflict with Vision Zero, the Mayor's aim to eliminate all deaths and serious injuries for London's transport network by 2041. While the proposed 1.5-metre-wide cycle lane and signage is acknowledged, another access arrangement is encouraged. If this is not possible, then trained banksman must be present during all delivery and servicing activity. The applicant should confirm how these measures would be secured in the outline application.	Noted. Trained banksmen will be present within the Cypress Place during all delivery and servicing activity for the reserved matters two (life-science building) use. This will be set out within the final Delivery and Servicing Management Plan which it is envisaged will be secured via planning condition. The Applicant is seeking to further review the approach to short-stay cycle parking with TfL Officers.

PROJECT: NETWORK BUILDINGS

SCHEDULE OF RESPONSES TO COMMENTS RECEIVED

	Short stay cycle parking for the Class E (g) use will be located within the public realm, close to building entrances. These should ideally be provided within the site boundary. However, the Class E (a)(b) retail floor space will not be provided with short stay spaces, which is not acceptable. London Plan (2021) standards are minimums and are the starting point for cycle parking provision, therefore under provision would be resisted. The applicant should increase the number of short stay cycle parking spaces, and/or work with Camden Council to ensure that at least the minimum number of short stay spaces are provided upon first occupation. All cycle parking should be designed in line with the London Cycling Design Standards (LCDS). The applicant should confirm how these measures would be secured in the outline application.	The Applicant confirms that all cycle parking will be LCDS compliant, and further discussions will be held with LB Camden regarding securing the short-stay cycle parkin
21.	**Para 100** - The removal of the existing basement car park and its repurposing for cycle parking is supported. Two standard parking bays, associated with the adjacent building, 90 Whitfield Street, would be retained in Cypress Place. However, development in the CAZ is expected to be car-free except for disabled persons parking. Therefore, the existing standard parking bays should not be re-provided. One disabled parking space would be provided in addition to the two existing bays which is acceptable	The parking bays associated with the adjacent development of 90 Whitfield Street sit outside the red line boundary and do not form part of this planning application. In addition, the use of these spaces is subject to a contractual agreement with tenants of 90 Whitfield Street that cannot be renegotiated at this time.
22.	**Para 104** - A Construction and Demolition Management Plan (CDMP) has been provided. A full CDMP should be provided and secured by condition	Noted and agreed.